UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

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JOSHUA G. HARRIS,

**Answer to Crossclaim** 

Plaintiff,

Case No. 22-cv-75

v.

TODD MCALISTOR, et al.,

Defendants.

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Defendants, City of Buffalo, Todd McAlister, Elnur Karadzhaev,
Dennis Taylor, Jeffrey Jajkowski, Maurice Foster, Andrew Dalgleish, Ashlee
Amoia, Luis Rivera, Edward Ramage, Chelsey Rogowski, Mary May, Victoria
Siracuse, Zackary Morin, Terrell Bolden, Philip Hinterberger, Anthony Avolio,
Jennifer Stutz, Scott Culver, Kenneth Anaya, Hiba Khalil and Kayla Wise
(collectively, the City defendants), by their undersigned attorney, upon
information and belief deny the allegations in paragraphs 33 and 34 of
defendants, G4S Secure Solutions, Shelia Kirsch, Teresa Dickinson and Amane
Ramadan's (collectively, the defendants) verified answer to plaintiff's amended
complaint (Dkt. 31) to the extent that the allegations are asserted against the City
defendants, and request judgment dismissing the defendants' crossclaim against
the City defendants, together with such other and further relief as the court may
deem appropriate.

Dated:

Buffalo, New York November 14, 2022 Yours, etc.,

Cavette A. Chambers Corporation Counsel Attorney for City Defendants

By: s/David M. Lee

Assistant Corporation Counsel City of Buffalo Department of Law 65 Niagara Square, 1104 City Hall

Buffalo, New York 14202

(716) 851-9691

dlee@city-buffalo.com

## **Certificate of Service**

I certify that on November 14, 2022, I caused the foregoing to be served upon plaintiff by regular mail addressed to Joshua G. Harris, 377 Dearborn Street, Buffalo, New York 14207.

Dated: Buffalo, New York

November 14, 2022

s/David M. Lee